IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE, AT KNOXVILLE

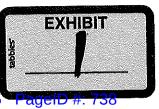
TINA MULLINAX; BRIAN MULLINAX; and ROBIN SUTTON;	
Plaintiffs;	No. 3:18-cv-00002
v.) Jury Trial Demanded
SEVIER COUNTY,)
SEVIER COUNTY AMBULANCE)
SERVICE;)
MICHAEL O'CONNOR, EMT IV;	
BLAKE GREGG;)
TODD SPENCE;)
JUSTIN JOHNSON, SCSO;	<u>, </u>
SCSO CORPORAL BART TYNER;)
SCSO DEPUTY JESSICA SAVARESE;	,
SCSO DEPUTY MICHAEL PHIPPS;	,)
SCSO DEPUTY WATTS;)
SCSO INVESTIGATOR JOHNNY)
BOHANON;)
SCSO SERGEANT WAYNE PATTERSON;)
Defendants.)))

PLAINTIFFS' REVISED WITNESS, EXHIBIT, AND DAMAGES LIST

Now come Plaintiffs, by and through undersigned counsel, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court's Scheduling Order [Doc. 25], and provide their witness, exhibit, and damages list as follows:

Witnesses Plaintiffs expect to present at trial:

- 1. All Plaintiffs,
- 2. All Defendants,



- 3. Any and all Defense witnesses, as well as rebuttal witnesses,
- 4. Brian Delius,
- 5. Records custodian of Sevier County Circuit Court Clerk,
- 6. Records custodian of Sevier County Sheriff's Office,
- 7. Chief Michael Hodges,
- 8. Sheriff Ron Seals,
- 9. Traci K. McClanahan,

Witnesses Plaintiff may call to testify at trial:

- 1. Major Karl Tuner,
- 2. Washington County Lt. Wiseman,
- 3. Washington County Deputy Ratliff,
- 4. Angie McIntyre,
- 5. Records custodian of Johnson City Police Department,
- 6. Former Chief of Police Mark Sirois of Johnson City PD,
- 7. Capt. Steve Smith of Johnson City PD,

Exhibits

- 1. All defense exhibits,
- 2. Trial transcript from trial of Brian and Tina Mullinax,
- 3. Incident reports,
- 4. Justin Johnson medical records,
- 5. Tina Mullinax medical records,
- 6. Sevier County personnel file of Justin Johnson,

- 7. Johnson City personnel file of Justin Johnson,
- 8. Sevier County training records of Justin Johnson,
- 9. Johnson City training records of Justin Johnson,
- 10. Booking report of Tina Mullinax,
- 11. Booking report of Brian Mullinax,
- 12. Sevier County Judgement for Brian Mullinax,
- 13. Sevier County Judgement for Tina Mullinax,
- 14. Sevier County Jail records for Brian Mullinax,
- 15. Sevier County Jail records for Tina Mullinax,
- 16. Recording of phone call between Brian Delius and Robin Sutton,
- 17. Sevier County Responses to Interrogatories, Requests for Production, and Requests for Admission of Brian Mullinax,
- Sevier County Responses to Interrogatories, Requests for Production, and Requests for Admission of Tina Mullinax,
- 19. Justin Johnson body cam,
- 20. Bart Tyner body cam,
- 21. Officers Watts, Husky, Hays, Phipps, and Patterson body cams,
- 22. Sevier County Notice of Termination of Justin Johnson,
- 23. Sevier County Employee Action Form for Justin Johnson,
- 24. Letter of resignation of Justin Johnson,
- 25. Witness/Officer statements,
- 26. Screenshot image showing phones examined at residence of Robin Sutton.

Damages

- 1. Emotional pain and suffering, and fear of Brian Mullinax \$30,000. Damages will be established through presentation of testimony of victims and witnesses.
- Physical and emotional pain and suffering and fear of Tina Mullinax \$40,000. Damages
 will be established through presentation of records and testimony of victims and witnesses.
- 3. Loss of liberty of Brian Mullinax resulting from illegal arrest, prosecution, and incarceration for forty-two days at a rate of approximately \$3,571.43 per day for a total of \$150,000. Damages will be established through presentation of testimony of victims and witnesses.
- 4. Loss of liberty of Tina Mullinax resulting from illegal arrest, prosecution, and incarceration for forty-two days at a rate of approximately \$3,571.43 per day for a total of \$150,000. Damages will be established through presentation of testimony of victims and witnesses.
- 5. Emotional pain and suffering and fear of Robin Sutton \$24,000. Damages will be established through presentation of testimony of victims and witnesses.
- 6. Property damage of Robin Sutton \$5,000 for damage to trailer caused by seven through and through bullet holes going through two walls. Damages will be established through presentation of testimony of victims and witnesses.
- 7. Invasion of privacy of Robin Sutton \$1,000. Damages will be established through presentation of testimony of victims and witnesses.
- 8. Punitive damages of \$350,000. Damages will be established through presentation of testimony of victims and witnesses.
- 9. Costs of trial and defense.
- 10. Attorney fees.

Respectfully submitted this 18th day of March, 2020,

By: s/ Cameron D. Bell

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